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8 Attorneys for Defendants
9 Quanta Storage, Inc. and Quanta Storage America, Inc.
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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 IN RE OPTICAL DISK DRIVE PRODUCTS
16 ANTITRUST LITIGATION

17 MDL Docket No. 3:10-md-02143-RS-JCS

18 This document relates to:

19 Case No. 3:13-cv-05370-RS

20 Hewlett-Packard Company,

21 Plaintiff,
22
23 **STIPULATION AND [PROPOSED]
24 ORDER REGARDING EXTENSION OF
25 TIME TO RESPOND TO FIRST
26 AMENDED COMPLAINT**

27 v.

28 Toshiba Corporation, et al.,
29 Defendants.

Hon. Richard Seeborg

[Fed. R. Civ. P. 4 and Civil L.R. 6-1]

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STIPULATION

WHEREAS on October 24, 2013, Plaintiff Hewlett-Packard Company (“HP”) filed a Complaint [Doc. No. 1] (the “Complaint”) naming Quanta Storage, Inc. (“QSI”) and Quanta Storage America, Inc. (“QSA”), among others, as defendants; and

WHEREAS on March 26, 2014, Plaintiff HP and Defendants QSI and QSA signed a Stipulation and [Proposed] Order Regarding Extension of Time to Respond to Complaint and Service of Process, in which QSI and QSA agreed to waive service of a summons under Rule 4 of the Federal Rules of Civil Procedure and waive any objections to the absence of service of a summons and the Complaint, and the parties to the stipulation agreed to extend the deadline for QSI and QSA to answer or otherwise respond to the Complaint to Tuesday, June 24, 2014, and this Court granted an Order based on that stipulation; and

WHEREAS on May 8, 2014, Plaintiff HP filed a First Amended Complaint in this matter, adding three new causes of action;

NOW, THEREFORE, Plaintiff HP and Defendants QSI and QSA, through their respective counsel, hereby stipulate and agree that:

1. Defendants QSI and QSA shall waive any objections to service of the First Amended Complaint filed by Plaintiff HP on May 8, 2014; and

2. Defendants QSI and QSA shall not be required to answer or otherwise respond to the Complaint by June 24, 2014, as stated in the prior stipulation signed by QSI and QSA; and

3. Defendants QSI and QSA shall have until August 8, 2014 to answer or otherwise respond to the First Amended Complaint. To the extent that Defendant Quanta Storage, Inc. and/or Defendant Quanta Storage America, Inc. move to dismiss the First Amended Complaint under Federal Rule of Civil Procedure 12(b)(6) or otherwise, the parties shall work in good faith to reach an agreed upon briefing schedule that they shall present to the Court no later than August 22, 2014, but in no event shall HP's response to any such motion(s) be due before October 7, 2014.

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IT IS SO STIPULATED.

Dated: June 13, 2014

CROWELL & MORING LLP

By: /S/ Daniel A. Sasse

Beatrice B. Nguyen
Daniel A. Sasse
Matthew J. McBurney
Nathanial J. Wood
Angela J. Yu

Attorneys for Plaintiff
Hewlett-Packard Company

Dated: June 13, 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

By: /S/ Christopher M. Neumeyer

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Attorneys for Defendants
Quanta Storage, Inc. and Quanta Storage America, Inc.

FILER ATTESTATION

Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I, Christopher M. Neumeyer, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

1
2 Dated: June 13, 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

3
4 By: /S/ Christopher M. Neumeyer

5 Christopher M. Neumeyer

6 Attorneys for Defendants
7 Quanta Storage, Inc. and Quanta Storage America, Inc.

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11 **[PROPOSED] ORDER**

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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14 DATED: 6/13/14



15 Honorable Richard Seeborg
16 United States District Judge

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